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**NOTES OF CASES.**

**Foreign Judgment—Criminal Prosecution for Negligence—Claim of Injured Person for Damages—Judgment for Criminal Offence; and Award of Damages to Injured Person—Severable Judgment—Penal Law.**—*Ranlin v. Fischer* (1911) 2 K. B. 93. It appears that according to French law, where a person is prosecuted for criminal negligence, the person injured may intervene in the proceedings and claim damages for the injury sustained, which claim is tried along with the criminal charge, and a judgment pronounced both as to the criminal offence, and the civil claim for damages. In the present case the defendant, an American lady, had recklessly galloped her horse in the Avenue du Bois de Boulogne, and had run into and seriously injured the plaintiff. The defendant had been prosecuted in the French court for the offence, and the plaintiff had made a claim for, and had been awarded damages for the injury he had sustained. This part of the judgment he now sued upon in this action. The defendant contended that as, under the well-settled rule of international law, that one country will not enforce the penal laws of another country the claim could not be enforced in England; but Hamilton, J., who tried the action, held that the judgment in question was severable and that an action might be maintained in England on that part of it which awarded damages. —Canada Law Journal.

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**Reward Recovered.**—Plaintiff in *MacFarlane v. Bloch*, 115 Pacific Reporter, 1056, found a pocketbook containing promissory notes of the value of more than \$1,000, payable to Bloch, the defendant. Soon after defendant advertised in a newspaper, making the following offer: "Lost—Pocketbook. Return to county judge's office; \$100.00 reward." In response thereto plaintiff went to the office, and saw Bloch's agent, and told him that she had come to get the reward for the lost pocketbook. When asked if she had the pocketbook, she replied that she knew where it was, and offered to produce it for the \$100 reward. Defendant, instead of holding to his offer, refused to pay, and had her arrested for larceny of the book. Then, in order to avoid criminal proceedings, she surrendered it to Bloch, and brought this action to recover the reward. The Supreme Court of Oregon holds that an offer of reward is to be construed by the same rules as other contractual offers; further, that it was immaterial that she found the book before the offer was made, the reward not being for the finding but for the return of the book. Plaintiff complied with the conditions of the offer, so judgment is granted her.

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**"Jim Crow" Cars.**—A case which turns upon the validity of an act of Oklahoma requiring railroad companies to provide separate